

SUMMARY OF THE ACCREDITATION PROCESS COMMITTEE MEETING NOVEMBER 1, 2000

The Accreditation Process Committee of the National Environmental Laboratory Accreditation Conference (NELAC) met on Wednesday, November 1, 2000, at 9 a.m. Pacific Standard Time (PST) as part of the Sixth NELAC Interim Meeting in Las Vegas, NV. The meeting was led by its chair, Ms. Janet Cruse of the Illinois Environmental Protection Agency (IL EPA). A list of action items is given in Attachment A. A list of participants is given in Attachment B. *The purpose of the meeting was to discuss agenda items and any new issues from the floor.*

INTRODUCTION

Ms. Cruse introduced herself and asked that each committee member introduce themselves. Dr. Gene Tatsch facilitated the meeting and read the NELAC meeting ground rules to the audience. Ms. Cruse then read the agenda to the audience and reminded the attendees of the scheduled joint session with the Field Activities Committee at 3:30 p.m. on November 1, 2000 to continue discussion on mobile laboratories and field measurements.

AGENDA ITEMS

Inclusion of the Accreditation Process Flowchart into Chapter 4

Ms. Cruse asked for comments from the floor on the proposed Accreditation Process flowchart. Several comments were made including the omission of the “No” option/direction concerning the flowchart section that deals with a laboratory not meeting NELAC Chapter 2 proficiency testing (PT) requirements before scheduling or performing an on-site assessment of the laboratory facility. The committee agreed that this would be omitted. There was also discussion concerning the order in which these NELAC certification steps were to be carried out. There were representatives from several state accreditation programs that noted on-site assessments were scheduled and/or performed during the process of the laboratory successfully analyzing two sets of PT samples. There was consensus between the attendees and the committee that the purpose of the flowchart is to offer guidance for interpreting the NELAC accreditation process and not defining the order in which each step is performed. The committee agreed that a disclaimer statement should be added to the flowchart to indicate that the flowchart is for guidance purposes only.

Section 4.0 Mobile Laboratory Accreditation

The issue of mobile laboratory accreditation and the proposed language changes to Section 4.0 paragraphs b and c were discussed at length, with Ms. Cruse introducing the topic by reading to the audience the proposed language changes from the Accreditation Process Committee. The proposed language would insert the phrase “analyzes samples exclusively” to paragraph b after the phrase “performs a subset of the analysis for which the fixed base laboratory is accredited, and”. In paragraph c the insertion of a similar phrase “analyzes samples from” would be added to the end of the phrase “for which the fixed base laboratory is accredited, and”. The intended

effect was that the word “operates” meant analyzing environmental samples, but the committee wanted specific language to enforce the point. There were questions and comments from the floor concerning the need for a definition of the term “mobile laboratory” and how field measurements differed from that definition. It was suggested by a participant that defining what constitutes a “field unit” and differentiating those from mobile laboratories would be the best approach to finding a solution to the problem of accrediting all mobile operations or only accrediting the entity which analyzes environmental samples through field units. All in attendance agreed that the definitions were not clear on what distinguishes a field measurement or a field unit from a mobile laboratory. The committee agreed that future teleconferences would be necessary to bring substantive suggestions to the upcoming Seventh NELAC Annual Meeting.

An attendee submitted proposed language for the addition of a paragraph f to Section 4.0 of the NELAC Standard that would specify that Federal accrediting authorities had jurisdiction to analyze samples from any state without the need for secondary accreditation from any state or territory. The suggested language for a paragraph f would read “An accreditation granted to a mobile or fixed base federal laboratory by a NELAP recognized federal accrediting authority shall be considered valid anywhere within the jurisdiction of the federal agency.” There were many questions from both the committee and the audience concerning this additional language and the effects of such an exception especially where federal mobile laboratories were concerned. Suggested language additions to Section 4.0 paragraphs b and c from Ms. Jeanne Hankins seemed to bring clarification to this issue. Ms. Hankins proposed language additions to paragraph b of Section 4.0 of the NELAC Standards that would read “The primary accrediting authority shall determine if a separate accreditation is required for a mobile laboratory that is owned by an accredited fixed base laboratory, operates under the same quality system as the fixed base laboratory, performs a subset of the analysis for which the fixed-base laboratory is accredited, which operates and analyzes samples exclusively from within the jurisdiction of the primary accrediting authority in which the parent fixed-base laboratory is located.” Section 4.0 paragraph c of the NELAC Standards would also be changed to read “Separate accreditation by the primary accrediting authority is required for a mobile laboratory that is owned by an accredited fixed-base laboratory, operates under the same quality system as the fixed-base laboratory, performs a subset of the analyses for which the fixed-base laboratory is accredited and analyzes samples from outside of the jurisdiction of the primary accrediting authority in which the parent fixed-base laboratory is located.” The committee agreed that this proposed language resolved federal laboratory reciprocity issues concerning laboratory accreditation.

Section 4.1.2 On-site Assessments

There was a suggestion from the floor that in Section 4.1.2 paragraph a of the NELAC Standards that the word “may” be changed to “shall.” This proposed language change would require that laboratories are assessed based on all fields of testing and/or methods for which the laboratory wants to obtain NELAC accreditation. There were several arguments against that language change because it severely impacted the primary accrediting authority in cases where full service laboratories with many methods and/or fields of testing would be required to be assessed on every one of those methods and/or fields of testing, which could take considerable time and allowed the primary accrediting authority no options when performing assessments. This will remain an unresolved issue for the committee to discuss during future teleconferences. The

committee will contact the On-site Assessment Committee of NELAC to discuss the original intent in Chapter 3 of the NELAC Standard on this issue.

Section 4.1.7.1 Primary Application Package

There was a suggestion from the floor that the application package for NELAC primary accreditation include license plate number and vehicle identification number of all mobile laboratories owned and operated by each entity making application. The committee agreed to this editorial change.

Section 4.1.8 Change of Ownership and/or Location of Laboratory

There was a suggestion from the floor that Section 4.1.8 of the NELAC Standard include a specific requirement that mobile laboratories not associated with a parent fixed-base laboratory be required to submit a change of address to their primary accrediting authority when any change of mailing address occurs, so that communications of all kinds be maintained with the mobile units. Representatives of the State of California Department of Health Services will submit proposed language on this issue.

ADJOURNMENT

Ms. Cruse called for any new issues from the floor and with no new business being introduced, she adjourned the meeting until the joint session with the Field Activities Committee on November 1, 2000 at 3:30 p.m.

JOINT MEETING BETWEEN THE ACCREDITATION PROCESS COMMITTEE AND THE FIELD ACTIVITIES COMMITTEE

The joint session between the Accreditation Process Committee and the Field Activities Committee began at 3:30 p.m. on November 1, 2000 during the final portion of the scheduled Field Activities Committee session. Mr. Dan Bivins presided and began by asking Ms. Janet Cruse to recap the history of mobile laboratory accreditation language in Section 4.0 of the NELAC Standard. Both Ms. Cruse and Mr. Gleason Wheatley covered the history of how the current language in Section 4.0 was derived.

There were numerous comments from those in attendance at this session concerning mobile laboratory accreditation and how this issue for some business entities remains unsettled. Several primary accrediting authority representatives spoke of the history of this issue and agreed that the language in Section 4.0 of the current NELAC Standard allowed them options when accrediting mobile laboratories operating exclusively within the home state of the parent fixed-base laboratory. There were discussions between both committees and the audience concerning the need for defining where the line was to be drawn between field units and mobile laboratories, but no clear definition of what constitutes a field unit was drafted from this meeting. Both the Field Activities Committee and the Accreditation Process Committee agreed to continue this discussion through future teleconferences. The Field Activities Committee moved on to their

last agenda item of the session at 4:50 p.m. and the Accreditation Process Committee exited the session.

**ACTION ITEMS
ACCREDITATION PROCESS COMMITTEE MEETING
NOVEMBER 1, 2000**

Item No.	Action	Date to be Completed
1.	Editorial changes to Chapter 4 of the NELAC Standard will be made for clarification purposes.	3/19/2001
2.	Review of Section 4.0 of the NELAC Standard relative to mobile laboratory operations.	3/19/2001
3.	The Accreditation Process Committee will continue to cooperate with the Field Activities Committee to ensure consistency with the existing NELAC Standard through future teleconferences.	Ongoing

**PARTICIPANTS
ACCREDITATION PROCESS COMMITTEE MEETING
NOVEMBER 1, 2000**

Name	Affiliation	Address
Cruse, Janet Chair	IL EPA, Division of Laboratories	T: (217)785-0601 F: (217)524-0944 E: epa.6111@epa.state.il.us
Hamilton, Maureen (Absent)	Ms. Maureen Hamilton, Consultant	T: (509)627-3716 F: (509)628-2398 E: mkhamilt@ix.netcom.com
Hill, David (Absent)	O'Brien and Gere Laboratories Inc.	T: (315)437-0200 F: (315)463-7554 E: hilldr@obg.com
Macelletti, Nicholas	State of CT, DPH, Env. Lab. Cert.	T: (860)509-7386 F: (860)509-7378 E: nicholas.macelletti@po.state.ct.us
Meyer, James	NC ENR/DWQ Laboratory Certif.	T: (919)733-3908 F: (919)733-6241 E: james.meyer@ncmail.net
Pullano, Robert (Absent)	General Engineering Laboratories	T: (843)556-8171 F: (843)766-1178 E: rlp@mail.gel.com
Wheatley, Gleason	State of KY/Dept. Environmental Protection	T: (502)564-6120 F: (502)564-8930 E: gleason.wheatley@mail.state.ky.us
Wyatt, Susan	MN Dept. of Health	T: (612)676-5674 F: (612)676-5514 E: susan.wyatt@health.state.mn.us
Wyeth, Robert	Severn Trent Laboratories	T: (716)691-2600 F: (716)691-7991 E: rwyeth@stl-inc.com
Tatsch, Gene (Contractor Support)	Research Triangle Institute	T: (919)541-6930 F: (828)628-0659 E: cet@rti.org
Ennis, J. Todd (Contractor Support)	Research Triangle Institute	T: (919)541-7226 F: (919)541-7386 E: jte@rti.org